

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KAYVAN KAROON and :  
KAMRAN KAROON, individually :  
and as Administrators of the Estate :  
of MAJID KAROON, and :  
MAHIN D. KAROON, :

Plaintiffs, :

v. :

CREDIT SUISSE GROUP :  
AG and CREDIT SUISSE AG, :

Defendants. :  
\_\_\_\_\_ :

Civil Action No. 15-CV-04643-JPO

**AFFIDAVIT OF KAMRAN KAROON  
IN OPPOSITION TO MOTION TO DISMISS**

STATE OF NEW JERSEY:

SS

COUNTY OF HUDSON:

KAMRAN KAROON, of full age, upon his oath deposes and says:

1. I am one of the plaintiffs in this matter. I make this affidavit upon personal knowledge in further opposition to the motion to dismiss of Credit Suisse Group AG and Credit Suisse AG ("Credit Suisse").

2. In its reply in further support of its motion to dismiss, Credit Suisse asserts that at the time it created a trust for my father, Majid Karoon, Mr. Karoon did not reside in New York or even in the United States. As will be seen *infra*, Credit Suisse is wrong.

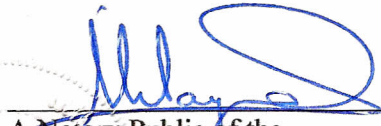

3. As support for the notion that Majid Karoon was not a New York resident, Credit Suisse attaches papers concerning a lawsuit that Majid Karoon commenced in 1983, in which he was alleged to reside in Paris, France. Majid Karoon did reside overseas in 1983, but he later moved to New York.

4. As pointed out in the Affidavit of Kayvan Karoon at paragraph 21, the Bank Leu legal department advised Majid Karoon concerning the formation of a trust in 1989. Hence, where Majid Karoon resided in 1983 is irrelevant and has no bearing on this matter.

5. Although Majid Karoon was living overseas in 1983, later in 1983 he permanently moved to New York. He eventually obtained a Green Card (Registration No. A27508317) entitling him to reside in the United States. In 1989 Majid Karoon was a permanent resident of New York and he had been for several years.

6. At the time the trust was created in 1989, Majid Karoon resided in New York as did I, my brother and my mother. Although we continued to maintain vacation homes in France and London, we had left France permanently and taken up permanent residency in New York many years prior to 1989.

Sworn and subscribed to before me  
this 2<sup>nd</sup> day of November, 2015.

  
A Notary Public of the  
State of New Jersey  
MILAGROS DIAZ  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 6/28/2020  
Kamran Karoon

ID2161202